

FACTUAL RESUME

UNITED STATES OF AMERICA

v.

SHANICE ADEL LAMBERT

2:12-CR-043-J

DEFENDANT PLEADING GUILTY TO ONE-COUNT SUPERSEDING INFORMATION

SUPERSEDING

INFORMATION: 18 U.S.C. § 2423(b)- Travel With Intent to Engage in Illicit Sexual Conduct.

MAXIMUM

PENALTY: Imprisonment for a period of not more than **30 years**; a fine not to exceed **\$250,000**, or twice any pecuniary gain to the defendant or loss to the victim(s); A term of supervised release of **not less than five (5) years to life**, which must follow any term of imprisonment. If the defendant violates the conditions of supervised release, she could be imprisoned for the entire term of supervised release and be subject to additional supervised release; Restitution to victims or to the community, which may be mandatory under the law, and which the defendant agrees may include restitution arising from all relevant conduct, not limited to that arising from the offense of conviction alone; and costs of incarceration and supervision.

ASSESSMENT: Pursuant to Title 18, United States Code, Section 3013(a), a mandatory assessment of **\$100** will be made.

ELEMENTS: *First:* That the defendant traveled in interstate commerce;

Second: That said interstate travel was done for the purpose of engaging in illicit sexual conduct with another person.

Illicit sexual conduct means a sexual act (as defined in 18 U.S.C. 2246) with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

Sexual acts include contact between the penis and the vulva and between the mouth and the penis and the mouth and the vulva.

Under Title 18, United States Code, Section 2243(a), which is a part of Chapter 109A, it is a violation, within the special maritime and

territorial jurisdiction of the United States, to engage in a sexual act with another person who has attained the age of 12 years, but has not attained the age of 16 years, and is at least four years younger than the person so engaging.

FACTS: While living in Childress, Texas, in the Amarillo Division of the Northern District of Texas, Shanice Adel Lambert was employed as a teacher's aide at a local school. Through her employment, and through association by the individual, a minor, with one of her children, Lambert met "John Doe," a 15 year-old boy who was a student at the school where Lambert was employed.

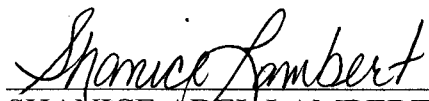
In and about February 2012, Lambert engaged in a relationship with "John Doe," which became sexual in nature. On February 11, 2012, after Lambert and "John Doe's" relationship had become sexual, Lambert traveled to Altus, Oklahoma, for the purpose, among others, of engaging in illicit sexual conduct with "John Doe." After arriving in Altus, Lambert rented a motel room, and engaged in sexual acts with "John Doe" that included contact between his penis and her vulva, and between her mouth and his penis.

STATUS: On Bond.

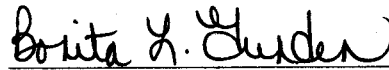
I, Shanice Adel Lambert, Defendant, in the above case, hereby state that the

facts set forth herein are true and correct.

Dated: November 15th, 2012.



SHANICE ADEL LAMBERT
Defendant



BONITA L. GUNDEN
Attorney for Defendant